



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

January 12, 1994

Reply To
Attn Of: HW-124

Ms. Lisa Green
Environmental Restoration Program
U.S. Department of Energy
Idaho Field Office
785 DOE Place
Idaho Falls, Idaho 83401-1562

Re: Draft Final Remedial Investigation/Feasibility Study for the
Test Area North Groundwater Operable Unit 1-07B

Dear Ms. Green:

We have reviewed the above-referenced document and on the basis of our evaluation of the information presented therein, we disagree with the supposition that a dense non-aqueous phase liquid (DNAPL) exists in the groundwater. Accordingly, we are unable to concur with the document as written. Our evaluation of the presence of DNAPLs is described in the enclosed technical memorandum.

In the absence of DNAPLS, restoration of the groundwater would likely be less complex and less costly, and would also have a greater potential for success. Therefore, we recommend that the Waste Area Group Managers convene to discuss the issue of DNAPLS in light of the enclosed memorandum and to explore more meaningful ways for restoration of the aquifer.

If you have any questions or comments, I may be contacted at 206/553-1752.

Sincerely,

Earl Liverman

Enclosure

cc: Dan Harelson, DOE-ID
Margie English, IDHW-DEQ
Carol Strong, Chem Nuclear-Geotech

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Initial gj Date 5/17/94